UNITED STATES DISTRICT COURT EASTERN DISTRICT OF PENNSYLVANIA

DAUD S. EL-BAKARA, SR.,

Plaintiff

Case No. 2:17-cv-05138-MMB

v.

WELTMAN, WEINBERG & REIS CO,. LPA,

Defendant

MOTION TO COMPEL DISCOVERY

Plaintiff Daud S. El-Bakara, by counsel, hereby requests that the Court compel Defendant to provide full and complete responses to Plaintiff's discovery requests. The reasons for this Motion are set forth in the accompanying Memorandum of Law, which is incorporated as if fully set forth herein.

Respectfully submitted,

FRANCIS & MAILMAN, P.C.

/s/ Joseph L. Gentilcore

JOSEPH L. GENTILCORE, ESQ. 100 S. Broad St., 19th Floor Philadelphia, PA 19110 (215) 735-8600 jgentilcore@consumerlawfirm.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of August, 2018, I electronically filed the foregoing with the Clerk of the Court for the Eastern District of Pennsylvania, using the CM/ECF system, which will provide notification of such filing to the parties of record.

/s/ Joseph L. Gentilcore
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